

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule. I believe in its present form, it could prevent me from continuing as a Cookie Lee Consultant. I understand that the FTC's responsibility is to protect the public from 'unfair and deceptive acts or practices,' but some of the sections of the proposed rule will make it very difficult if not impossible for me to sell Cookie Lee Jewelry products.

One of the most concerning sections is the proposed rule that a person should wait seven days to enroll as a new consultant. Our initial business investment options are between \$300 and \$600 and that is a very reasonable amount to start one's own business. This initial investment includes a small inventory plus a nominal start-up fee. People purchase TV's, cars, and other items that cost far more than that and they do not have to wait 7 days to take ownership of those large ticket items. Compared to the cost of starting a traditional bricks and mortar business or franchise the direct sales industry offers the lowest financial exposure/risk available. This proposed waiting period gives the impression that there might be something wrong with our products and our industry. This would hugely affect my record-keeping processes as well and would cause people to wait unnecessarily to get started right away making extra money for their families.

I have been selling jewelry for almost three years and when I decided I would like to start my business I signed up immediately! I would like you to know that this business has offered my family financial flexibility and has done the same for many others. In addition to contributing to my families' income, I have been able to pursue other interests due to the flexible schedule I am able to maintain with my Cookie Lee Business. The flexible schedule and additional family income are just two of the many benefits I have realized from being in direct sales. I have grown in my personal life and as a leader of a business group of over 35 women who I assist and train. My family depends on this income and your proposal would certainly have a negative affect on that income. In addition to the above-mentioned benefits, many direct sales businesses offer incentives not available in traditional business. For example, the vacation I was able to earn to Turks & Caicos for my husband and myself. In a traditional job, I may have earned vacation days but rarely would the employer pay for my vacation to Club Med just to celebrate my hard work.

The proposed rule also calls for the release of any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. Today, frivolous lawsuits are commonplace with companies and people sued for anything. In this scenario, any one for any reason could bring a lawsuit against a company with the sole intent of damaging the company's reputation and sales. It does not make sense to me that I would be required to disclose these lawsuits unless the business was guilty. Having to disclose this information would put companies and consultants at an unfair disadvantage even though neither had done anything wrong. Unfortunately, even malicious lawsuits imply impropriety and can taint a business or product. I am sure you will agree, if a company has been innocent they definitely do not deserve to be penalized.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchase. I find this ridiculous. How would a new consultant ever get started? If I am in a department store I do not request the personal information on the last 10 people that were in line, nor do I ask whom the 10 people closest to the store are that last purchased. Who would think it reasonable for a business owner to approach a customer that has just entered her store and offer a list of her stores competitors along with their contact information? Who would think it reasonable to walk into Wal-Mart or Neiman Marcus and ask to see a contact list (including name, phone, and email) of the last 10 people who shopped their store? Who would consider this a fair business practice for the self-employed direct seller? Furthermore, what would prevent consultants in other organizations from posing as potential clients to gain access to direct seller's customer list? How would consultant be able to build and protect a customer base and encourage customer loyalty?

In addition, just as in a regular store I do not know all my customers. Requiring my business to disseminate personal information will violate customer privacy and possibly raise the risk of exposure to identity theft and fraud.

I appreciate the work of the FTC to protect consumers, however I feel this is a very insidious proposal, which cannot be good for our customers, potential business members, or industry. Furthermore, I feel that this proposed rule will have many unintended consequences and hurt our already suffering economy.

Thank you for your time and consideration. Kind Regards, Cynthia "CYAN" Trujillo Director 2,  
Cookie Lee Jewelry

Wear It! Share it! Sell it! Shine!Cookie Lee Consultants always have a BLING'N good time!Become A  
Cookie Lee Consultant Today &Join our GEM GIRLS DREAM TEAM!